

STATE OF MISSOURI)
)
COUNTY OF DENT) SS.

FILED
MAY 21 2010

RUTH ANN WILLIAMS
CLERK
DENT COUNTY, MO

IN THE CIRCUIT COURT OF THE COUNTY OF DENT
STATE OF MISSOURI

CAROLINA BAILEY,

Plaintiff,

v.

CASEY'S GENERAL STORE

Serve at: 201 S. MAIN STREET
SALEM, MO 65560

Defendant.

Cause No. *10DE-CC00025*

Division No. *I*

JURY TRIAL DEMANDED

PETITION

Plaintiff, for his cause of action against Defendant, states as follows:

1. Plaintiff is a resident of the State of Missouri.
2. Defendant is a corporation with authority to sue and be sued.
3. On June 22, 2007, Plaintiff was an invitee at Casey's General Store when she slipped and fell due to a hole in the sidewalk and curb injuring herself as set out more fully below.
4. The hole in the parking lot and curbs made the area unreasonably unsafe, and was not a general condition of the area.
5. Defendant knew or by using ordinary care could have known of this unsafe condition.
6. Defendant failed to use ordinary care to remedy or warn of the condition.
7. As a direct result of the negligence of Defendant as set out more fully above, the

area of Defendant's property was not reasonably safe.

8. As a direct result of the negligence of Defendant as aforesaid, Plaintiff sustained injuries to the various bones, joints, muscles, nerves and systems of his body; specifically her neck, right elbow, right knee and scrapped left knee, right arm and leg; she has incurred medical expenses in an amount in excess of \$8,106.10 and will in the future incur medical expenses; her injuries are permanent, progressive and disabling; her ability to work, labor and enjoy life has been and will in the future be impaired, all to his damage.

WHEREFORE, for having shown good cause, Plaintiff prays this Court enter Judgment against Defendant in an amount that is fair and reasonable under the circumstances and for such other and further relief as this Court deems reasonable and proper.

THE S.E. FARRIS LAW FIRM

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